

CASE NUMBER
2320064432
SN:2.0 PC:2

FILED
2/15/2023
Timothy W Fitzgerald
Spokane County Clerk

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

MICHAEL EUGENE JOSEPH POOLE,

Plaintiff,

vs

ESTATE OF CRAIG FIGLEY and KATHERINE
E. KIPP, Personal Representative of the Estate of
Craig Figley, as liable for decedent Defenant
CRAIG FIGLEY, COLVILLE SCHOOL
DISTRICT NO. 115, RICHARD D. COLE,
CHARLES V. SALINA, and MICHAEL
CASHION,

Defendants.

Case No. 23-2-00644-32

SUMMONS

(20 Days)

TO THE DEFENDANT(S): A lawsuit has been started against you in the above entitled court by MICHAEL POOLE, plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within 20 days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiff is entitled to what she or he asks for because you have not responded. If you serve a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

Summons
Page | 1



Buzzard O'Rourke, P.S.
attorneys at law

Service Address
314 Harrison Avenue
Centralia
Washington
98531

Mailing Address
PO Box 59
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Washington
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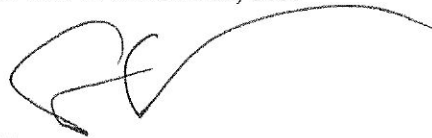
1 You may demand that the plaintiff file this lawsuit with the court. If you do so, the demand
2 must be in writing and must be served upon the person signing this summons. Within 14 days after
3 you serve the demand, the plaintiff must file this lawsuit with the court, or the service on you of
4 this summons and complaint will be void.

5
6 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
7 that your written response, if any, may be served on time.

8 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State of
9 Washington.

10 Dated this 10th day of February, 2023, at Chehalis, Washington.

11
12
13 BUZZARD O'ROURKE, P.S.

14 

15
16 SHANE M. OROURKE, WSBA No. 39927
17 Attorney for the Plaintiff
18 P.O. Box 59, Centralia, WA 98531
19 Tel: (360) 736-1108
20 Fax: (360) 330-2078



CASE NUMBER
2320064432
SN:3.0 PC:16

FILED
2/15/2023
Timothy W Fitzgerald
Spokane County Clerk

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SPOKANE COUNTY**

MICHAEL EUGENE JOSEPH POOLE,

Case No. 23-2-00644-32

Plaintiff,

COMPLAINT

vs.

ESTATE OF CRAIG FIGLEY and
KATHERINE E. KIPP, Personal Representative
of the Estate of Craig Figley, as liable for
decedent Defenant CRAIG FIGLEY,
COLVILLE SCHOOL DISTRICT NO. 115,
RICHARD D. COLE, CHARLES V. SALINA,
and MICHAEL CASHION,

Defendants.

COMES NOW, Plaintiff, MICHAEL EUGENE JOSEPH POOLE, by and through his Attorney
of record, SHANE M. O'ROURKE, of BUZZARD O'ROURKE, P.S., and alleges as follows:

I. PARTIES

1.1. Plaintiff MICHAEL EUGENE JOSEPH POOLE was at all relevant times a resident of
Stevens County, Washington.

1.2. Defendant, CRAIG FIGLEY, ESTATE OF CRAIG FIGLEY, and KATHERINE E. KIPP,
Personal Representative of the Estate of Craig Figley, hereinafter "Defendant FIGLEY", was at
all relevant times the School Counselor and Group Therapy Director for Defendant COLVILLE



1 SCHOOL DISTRICT NO. 115. CRAIG FIGLEY died in 2022, at the Washington State
2 Penitentiary in Walla Walla, Washington where he was serving a prison sentence for sexual abuse
3 of other students. Prior to his incarceration, at the time of the causes of action alleged herein and
4 all other times relevant to this case, Defendant FIGLEY was an agent or principal acting on behalf
5 of Defendant COLVILLE SCHOOL DISTRICT NO. 115 and a resident of Stevens County,
6 Washington.
7

8 1.3. Defendant COLVILLE SCHOOL DISTRICT NO. 115 is a school district organized and
9 operated under the laws of the State of Washington and located in Stevens County, Washington.
10

11 1.4. Defendant RICHARD D. COLE, upon information and belief, was Superintendent of
12 Defendant COLVILLE SCHOOL DISTRICT NO. 115 during the alleged causes of action of
13 Defendant FIGLEY and was residing in Stevens County, Washington. Defendant RICHARD D.
14 COLE was an agent or principal acting on behalf of Defendant COLVILLE SCHOOL DISTRICT.
15

16 1.5. Defendant CHARLES V. SALINA, upon information and belief, was the Principal over
17 Hofstetter Elementary School from 1984 to 1994, Fort Colville School from 1994 to 1998, and of
18 Colville High School from 1998 to 2005, in Colville School District No. 115. Defendant SALINA
19 was a supervisor/administrator over Defendant FIGLEY from approximately 1994 through 1998
20 and was at all times relevant to this case residing in Stevens County, Washington. Defendant
21 SALINA was an agent or principal acting on behalf of Defendant COLVILLE SCHOOL
22 DISTRICT NO. 115 at all times relevant to this case.
23

24 1.6. Defendant MICHAEL CASHION, upon information and belief, was a supervisor of
25 Defendant FIGLEY at the Colville School District from on or around 1990 and continuing through
26 certain relevant time periods in this case to be determined during discovery, during which time
27 Defendant FIGLEY'S alleged causes of action occurred. Defendant CASHION was at all times
28



1 relevant to this case residing in Stevens County, Washington and was an agent or principal acting
2 on behalf of Defendant COLVILLE SCHOOL DISTRICT NO. 115.

3 **II. JURISDICTION AND VENUE**

4 2.1. Pursuant to RCW 4.96.020, Plaintiff served a Notice of Claim with Defendant COLVILLE
5 SCHOOL DISTRICT NO. 115 and the Superintendent of the Colville School District on October
6 4, 2022. Plaintiff mailed the claim to the Superintendent of the Colville School District on
7 September 29, 2022. Furthermore, upon review of the Stevens County Auditor's records, it was
8 discovered that Defendant COLVILLE SCHOOL DISTRICT NO. 115 failed to record with the
9 Steven's County Auditor an agent for claims as required by RCW 4.96.020(2). Regardless, more
10 than 60 days have elapsed since the Claim for Damages was served on the Colville School District.
11 There are no deficiencies in the content of the claim for Damages or in the service of the Claim on
12 Defendants. This Complaint was filed within the applicable statute of limitations. All administrative
13 conditions precedent to filing this suit have been met. No relief has been offered.

14 2.2. All relevant acts or omissions complained of by Plaintiff against Defendants occurred in
15 Stevens County, State of Washington.

16 2.3. Defendant COLVILLE SCHOOL DISTRICT NO. 115 is a governmental entity that is or
17 may be liable to Plaintiff for damages. Pursuant to RCW 36.01.050 plaintiffs have the right, and do
18 hereby exercise said right, to file this matter in one of the two (2) adjacent counties. Plaintiff selects
19 the County of Spokane as the appropriate venue for this action.

20 **III. FACTS**

21 3.1. Plaintiff realleges and incorporates by reference all prior paragraphs as if stated in their
22 entirety.



1 3.2. Plaintiff attended Colville School District. Specifically, Plaintiff attended Fort Colville
2 School and Colville Junior High School. Based on information and belief, Plaintiff attended Fort
3 Colville Elementary School on or about and between August 1, 1990 to August 1, 1995, and
4 Colville Junior High School on or about and between August 1, 1995 to August 1, 1998. Due to
5 sexual abuse suffered by Plaintiff as a child and the accompanying trauma and symptoms of same
6 as universally recognized in the professional community on this topic, Plaintiff is unable to
7 remember exactly when the causes of action occurred outside of the dates listed above. Based on
8 information and belief, such information is in the possession of Defendant Colville School District
9 and will be revealed further in the discovery process. Plaintiff reserves the right, if necessary, to
10 amend his Complaint to conform with additional or different dates revealed in discovery.
11

12 3.3. Defendant FIGLEY was hired by Defendant COLVILLE SCHOOL DISTRICT NO. 115
13 on or about 1985 as a School Counselor and Group Therapy Director.
14

15 3.4. Defendant COLVILLE SCHOOL DISTRICT NO. 115 assigned Defendant FIGLEY to
16 Fort Colville Elementary School as a School Counselor and Group Therapy Director where he
17 worked in that capacity while Plaintiff attended the school.
18

19 3.5. Plaintiff, while attending Fort Colville Elementary School was assigned to a therapy-like
20 group for at-risk youth, hereinafter "the group." Defendant FIGLEY supervised and led the group
21 of children. Upon information and belief, the causes of action alleged herein may also have occurred
22 under similar circumstances while Plaintiff was attending Fort Colville School and Colville High
23 School. The locations of abuse will be further revealed in discovery.
24

25 3.6. Upon information and belief, Plaintiff was in the group for at-risk youth because his parents
26 were not married or residing together.
27



1 3.7. Prior to being involved with the group, Plaintiff was doing reasonably well in school, did
2 not smoke, drink, or use drugs, and was a normal happy student.

3 3.8. While Plaintiff was enrolled in the group, Defendant FIGLEY informed Plaintiff that he
4 needed to photograph him.

5 3.9. Defendant FIGLEY informed Plaintiff the photos were for the State and Child Protective
6 Services and were being taken at the request of the Colville School District.

7 3.10. Defendant FIGLEY took photographs of Plaintiff while Plaintiff was in various states of
8 undress. The photographs were taken at school, and subsequently, after Defendant FIGLEY
9 groomed Plaintiff and lured him outside of school grounds, at other locations, including Defendant
10 FIGLEY's residence.

11 3.11. Defendant FIGLEY, while working in his capacity as an employee of Defendant
12 COLVILLE SCHOOL DISTRICT NO. 115, "groomed" Plaintiff by befriending him, convincing
13 Plaintiff he had his best interests at heart, by acting under color of the authority of the School
14 District, and convincing Plaintiff that he should engage in sexually inappropriate conduct under the
15 guise that it was necessary to his participation the group, and required by governmental entities,
16 agencies, and the School District.

17 3.12. Defendant FIGLEY abused his position of trust within the Colville School District to
18 sexually abuse Plaintiff, and many other students over years of employment as evidenced through
19 subsequent civil litigation and criminal convictions.

20 3.13. Defendant Figley sexually abused Plaintiff on numerous occasions.

21 3.14. Upon information and belief, Defendant FIGLEY, while working on school grounds,
22 made arrangements to drive Plaintiff from school to FIGLEY's house, and/or to Plaintiff's house
23 to facilitate inappropriate and illegal sexual activity with Plaintiff.



1 3.15. Upon information and belief, Defendant COLVILLE SCHOOL DISTRICT NO. 115 and
2 its agents, knew or should have known Defendant FIGLEY was transporting the child from school
3 grounds in his private vehicle.

4 3.16. Based on information and belief, Defendants CASHION, SALINA, and COLE supervised
5 or had supervisory authority over Defendant FIGLEY during the times the causes of action herein
6 occurred at the hands of Defendant FIGLEY.

7 3.17. Based on information and belief, none of the Defendants named herein investigated
8 Defendant FIGLEY or disciplined him for his inappropriate acts with Plaintiff when they knew or
9 should have known he was engaging in such conduct.

10 3.18. Defendant COLVILLE SCHOOL DISTRICT NO. 115 knew of the devastating lifelong
11 emotional and developmental consequences to children that are associated with sexual abuse
12 committed by adults in positions of trust within a school setting.

13 3.19. Defendant Colville School District had a legal responsibility and duty of care to ensure
14 that its employees were not engaging in abuse of school children.

15 3.20. After, and as a result of being sexually abused by Defendant FIGLEY, Plaintiff began
16 exhibiting erratic and unsafe behavior, including but not limited to, smoking, doing drugs, skipping
17 school, and doing poorly in school. These are hallmark consequences that occur for children who
18 have been sexually abused.

19 3.21. Since enduring the sexual abuse by Defendant FIGLEY, Plaintiff's interpersonal and
20 intimate relationships have been harmed, he has struggled with drug addiction, securing
21 employment, has suffered mental anguish and suffering, and has been in and out of jail for drug
22 related offenses, which upon information and belief would have been declared unconstitutional in
23 Washington State (*State v. Blake*). Plaintiff has strained relationships with his children as well.



1 Plaintiff has suffered severe depression and mental health issues since the sexual abuse. Plaintiff's
2 injuries are severe, and his damages are significant.

3 **IV. FIRST CAUSE OF ACTION – SEXUAL ABUSE and/or SEXUAL ASSAULT**

4 As to all Defendants (Washington Common Law)

5 4.1. Plaintiff realleges and incorporates by reference all prior paragraphs as if stated in their
6 entirety.

7 4.2. During the time in which Plaintiff was a student in the Colville School District, Defendant
8 FIGLEY sexually abused Plaintiff on multiple occasions.

9 4.3. Defendant FIGLEY as an employee and/or agent of Defendants, during the course of his
10 employment and/or agency repeatedly sexually abused Plaintiff.

11 4.4. As a direct and proximate result of the all Defendants' tortious actions, the Plaintiff has
12 suffered injuries and damages to be proven at trial.

13 **V. SECOND CAUSE OF ACTION - CHILDHOOD SEXUAL ABUSE**

14 As to all of the Defendants (Washington Common Law)

15 5.1. Plaintiff re-alleges the paragraphs set forth above.

16 5.2. The acts of childhood sexual abuse and exploitation of the Plaintiff by Defendants'
17 employee and/or agent constituted the tort of childhood sexual abuse.

18 5.3. The Defendants' knowledge and/or negligent failure to take action to prevent the abuse
19 proximately caused the Plaintiff extreme emotional injuries.

20 5.4. As a direct and proximate result of Defendants' tortuous acts, the Plaintiff has suffered
21 injuries and damages to be proven at trial.



1 **VI. THIRD CAUSE OF ACTION – NEGLIGENCE**

2 As to all Defendants (Washington Common Law)

3 6.1. Plaintiff realleges and incorporates by reference all prior paragraphs as if stated in their
4 entirety.

5 6.2. Defendant COLVILLE SCHOOL DISTRICT NO. 115 acted negligently and violated their
6 duty of care to their students in hiring, employing, failing to supervise, failing to identify the
7 inappropriate and criminal sexual actions of, and failing to discipline Defendant FIGLEY. As a
8 School District stands in *loco parentis* to its students, the School District had a higher duty of care
9 to provide for and protect its students from known dangers, or dangers that could have been readily
10 known with the exercise of diligence.

11 6.3. Defendant COLVILLE SCHOOL DISTRICT NO. 115, and those acting under its purview,
12 including but not limited to, Defendant COLE, Defendant SALINA, and Defendant CASHION,
13 had a duty to anticipate the dangers of sexual predators and implement an appropriate supervision
14 and investigation program.

15 6.4. Defendants had a duty to terminate Defendant FIGLEY from employment.

16 6.5. Defendant COLVILLE SCHOOL DISTRICT NO. 115 had a duty not to employ a sexual
17 predator in a position of trust over vulnerable children.

18 6.6. Defendants and/or each of them had a special relationship with Plaintiff and also had a duty
19 to protect him from reasonably foreseeable harm. Defendants negligently hired, supervised, and
20 retained Defendant FIGLEY in his positions within the School District. Defendants knew or should
21 have known of Figley's pedophilic tendencies and criminal behavior, which included sexual abuse
22 and exploitation of Plaintiff.
23
24
25
26
27
28



1 6.7. Defendants and each of them negligently failed to protect Plaintiff from Figley's sexual
2 abuse and exploitation.

3 6.8. Defendants have breached their aforesaid duties of care by:

4 6.9. Choosing not to establish adequate protocols, procedures, and rules to ensure the safety of
5 the students and vulnerable children receiving education and care in its facilities.
6

7 6.10. Failing to prevent Defendant FIGLEY from transporting vulnerable students off school
8 grounds.

9 6.11. Failing to properly monitor and supervise its employee Defendant FIGLEY, who was
10 authorized to provide care to vulnerable students.
11

12 6.12. Failing to adequately establish protocols, procedures and rules to ensure the safety of the
13 students and vulnerable children receiving education and care in its facilities.

14 6.13. Failing to provide adequate training regarding sexual misconduct reporting, sexual abuse
15 reporting, or sexual harassment reporting training.

16 6.14. Failing to ensure adequate safety for students.

17 6.15. Failing to properly investigate employees.

18 6.16. Failing to properly train agents and employees.

19 6.17. Failing to properly supervise and control employees.

20 6.18. Choosing to place Defendant FIGLEY in a position of trust and authority over children
21 susceptible to abuse.
22

23 6.19. Defendant COLVILLE SCHOOL DISTRICT NO. 115, Defendant COLE, Defendant
24 SALINA, and Defendant CASHION failed to prevent sexual abuse of Plaintiff by FIGLEY.
25

26 6.20. As a direct and proximate result of Defendants' negligence, Plaintiff suffered physical and
27 mental injuries, in an amount to be proven at trial.
28



6.21. As a direct and proximate result of Defendant' negligence, Plaintiff suffered physical and mental injuries, in an amount to be proven at trial.

VII. FOURTH CAUSE OF ACTION – TITLE IX VIOLATION

As to all Defendants

7.1. Plaintiff realleges and incorporates by reference all prior paragraphs as if stated in their entirety.

7.2. The actions and omissions of Defendants constitute a violation of Plaintiff's right to be free from sexual discrimination pursuant to Title IX of the Education Amendments of 1972, 20 U.S.C. §1681 et seq.

VIII. FIFTH CAUSE OF ACTION – SEX DISCRIMINATION

As To all Defendants (Ch. 49.60 RCW – Washington Law Against Discrimination)

8.1. Plaintiff realleges and incorporates by reference all prior paragraphs as if stated in their entirety.

8.2. Colville School District schools are places of public accommodation to which Chapter 49.60 RCW – Washington Law Against Discrimination ("WLAD") – applies.

8.3. Sexual assault is a form of sex discrimination.

8.4. Defendant FIGLEY while employed by Defendant COLVILLE SCHOOL DISTRICT NO. 115 sexually assaulted Plaintiff during his employment.

8.5. Defendant COLVILLE SCHOOL DISTRICT NO. 115 is liable for permitting the sexual abuse to take place.

8.6. As a direct and proximate cause of Defendant COLVILLE SCHOOL DISTRICT NO. 115's negligence, Plaintiff suffered physical and mental injuries, in an amount to be proven at trial.

8.7. In addition to damages for Plaintiff's mental and physical injuries, Plaintiff is entitled to an award of the costs of suit including reasonable attorneys' fees. RCW 49.60.030.



1 **IX. SIXTH CAUSE OF ACTION – OUTRAGE**

2 As To All Defendants (Washington Common Law)

3 9.1. Plaintiff realleges and incorporates by reference all prior paragraphs as if stated in their
4 entirety.

5 9.2. Based on the paragraphs set forth and alleged above, Defendants' conduct negligently,
6 recklessly, and/or willfully or intentionally inflicted emotional distress upon Plaintiff.

7 **X. SEVENTH CAUSE OF ACTION – NEGLIGENT INFLECTION OF EMOTIONAL**
8 **DISTRESS**

9 As To All Defendants (Washington Common Law)

10 10.1. Based on the paragraphs set forth and alleged above, the Defendants' conduct constituted
11 negligent infliction of emotional distress, and Defendants are liable for Plaintiff's damages
12 proximately caused by their actions as provided in more detail above.

13 **XI. EIGHTH CAUSE OF ACTION – INTENTIONAL INFLECTION OF EMOTIONAL**
14 **DISTRESS**

15 As to all Defendants (Washington Common Law)

16 11.1. Based on the paragraphs set forth and alleged above, the Defendants' conduct constituted
17 intentional infliction of emotional distress and Defendants are liable for Plaintiff's damages
18 proximately caused by their actions as provided in more detail above.

19 **XII. NINTH CAUSE OF ACTION – AGENCY**

20 As to all Defendants

21 12.1. Based on the paragraphs set forth and alleged above, Defendants at all relevant times had
22 control over the employees and staff employed by Colville School District, and otherwise allowed
23 Defendants to act as an actual or apparent agent, giving rise to vicarious liability under Washington
24 State common law, all of which proximately caused the sexual abuse of Plaintiff and resultant
25 damages for which Defendants are liable.
26
27
28



1 **XIII. INJURIES AND DAMAGES**

2 13.1. As a direct and proximate result of the Defendants' actions or omissions, Plaintiff suffered
3 injuries and damages.

4 13.2. As a result of the Defendants' actions or omissions, Plaintiff incurred and may continue
5 to incur medical and other related expenses associated with treatment of his injuries in an amount
6 to be proven at trial.

7 13.3. As a result of the Defendants' actions or omissions, Plaintiff has suffered and may
8 continue to suffer pain, anguish, anxiety, stress, inconvenience, and disability, which may be of
9 temporary or permanent nature, in an amount to be proven at trial.

10 13.4. As a further result of the Defendants' actions or omissions, Plaintiff has suffered lost
11 wages and earnings, past, present, and future in an amount to be proven at trial.

12 13.5. As a result of the Defendants' actions or omissions, Plaintiff may have incurred additional
13 special damages to be established at the time of trial.

14 **XIV. RESERVATION OF RIGHTS**

15 14.1. Plaintiff reserves the right to assert additional claims as may be appropriate following
16 further investigation and discovery.

17 **XV. JURY DEMAND**

18 15.1. Plaintiff demands this case to be tried by a jury.

19 **XVI. PRAAYER FOR RELIEF**

20 Plaintiff respectfully requests the following relief:

21 16.1. That the Court award Plaintiff appropriate relief, to include all special and general
22 damages established at trial, including but not limited to:

23 Past and future mental and physical pain and suffering.



1 Past and future physical and emotional impairment and interference with normal life.

2 Past and future medical expenses.

3 Past and future wage loss and impairment of earning capacity.

4 Any additional special damages proven at trial.

5
6 16.2. That the Court award pre-judgment interest on items of special damages.

7 16.3. That the Court award post-judgment interest.

8 16.4. For such attorney's fees, prejudgment interest, costs, and exemplary damages as maybe
9 provided by law.

10
11 16.5. That the Court award Plaintiff such other, favorable relief as may be available and
12 appropriate under law or at equity.

13 16.6. That the Court enter such other and further relief as the Court may deem just and proper.

14 Dated this 9th day of February, 2023

15
16 BUZZARD O'ROURKE, P.S.

17
18 

19 SHANE M. OROURKE, WSBA No. 39927

20 Attorney for Plaintiff

21 P.O. Box 59

22 Centralia, WA 98531

23 Tel: (360)735-1108

24 Fax: (360) 330-2078

25 Email: shane@buzzardlaw.com



CERTIFICATION

I, MICHAEL EUGENE JOSEPH POOLE, certify (and declare) under penalty of perjury under the laws of the state of Washington that I am the Plaintiff herein, have read the foregoing Complaint, and know the contents thereof and believe the same to be true.

SIGNED THIS 13 day of February, 2023, at 22:19, WA.


Michael Poole (Feb 13, 2023 22:21 PST)

MICHAEL EUGENE JOSEPH POOLE




220923 FINAL Complaint with corrected name.2


Final Audit Report


2023-02-14


Created:	2023-02-13
By:	Reception Buzzard O'Rourke (reception@buzzardlaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA_XiPrVt51f5e4EsFFiCwNTVVXZj1xvVW


"220923 FINAL Complaint with corrected name.2" History


 Document created by Reception Buzzard O'Rourke (reception@buzzardlaw.com)
2023-02-13 - 10:17:14 PM GMT- IP address: 73.11.145.105

 Document emailed to raeann1989@gmail.com for signature
2023-02-13 - 10:18:00 PM GMT

 Email viewed by raeann1989@gmail.com
2023-02-14 - 6:17:11 AM GMT- IP address: 72.160.109.93

 Signer raeann1989@gmail.com entered name at signing as Michael poole
2023-02-14 - 6:21:18 AM GMT- IP address: 172.58.43.233

 Document e-signed by Michael poole (raeann1989@gmail.com)
Signature Date: 2023-02-14 - 6:21:20 AM GMT - Time Source: server- IP address: 172.58.43.233

 Agreement completed.
2023-02-14 - 6:21:20 AM GMT

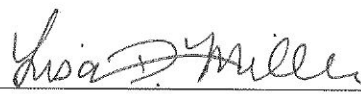
ELECTRONIC AFFIDAVIT

LISA D. MILLER, being first duly sworn upon oath under penalty of perjury under the laws of the State of Washington, deposes and states that:

1. I am a paralegal employed by Buzzard O'Rourke, P.S. Shane M. O'Rourke is the attorney of record for Michael Eugene Joseph Poole, the Plaintiff herein.
2. The document entitled "Complaint" consists of sixteen (16) pages, including this page. I have examined the document and certify that it is complete and legible.
3. I am the individual who received the signature page in ".pdf" format from Michael Eugene Joseph Poole by electronic transmission to my e-mail address of lisa@buzzardlaw.com.

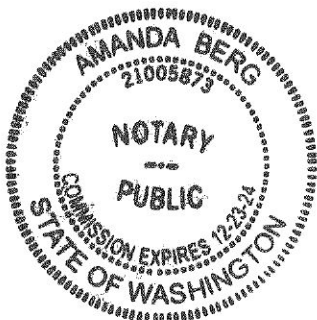
DATED this 14th day of February, 2023.


BUZZARD O'ROURKE, P.S.


LISA D. MILLER, Paralegal

STATE OF WASHINGTON)
) ss.
COUNTY OF LEWIS)

Sworn to before me by the above-named affiant and GIVEN UNDER MY HAND AND OFFICIAL SEAL this 14th day of February, 2023.




NOTARY PUBLIC in and for the State of
WA, Residing at: Centralia
My Commission Expires: 12/23/2024
Printed Name: Amanda Berg

